To: Albright, David[Albright.David@epa.gov]
From: Dermer, Michele
Sent: Tue 10/28/2014 8:49:55 PM
Subject: RE: EPA Requested Data

There are only about six operators. Maybe that will make the exemption process go more smoothly. Trying to remain optimistic.

From: Albright, David
Sent: Tuesday, October 28, 2014 1:43 PM
To: Habel, Rob@DOC
Cc: Reeves, Bruce@DOC; Bohlen, Steven@DOC; Montgomery, Michael; Dermer, Michele
Subject: RE: EPA Requested Data

Thanks Rob,

Two quick questions come to mind – 1) do you have an updated list of wells injecting into non-hydrocarbon producing formations? A list had been provided back in August, but it was our understanding that you were continuing to refine that list; and 2) we are puzzled by the discrepancy between recent statements that DOGGR has identified around 1,600 wells injecting into non-exempt formations (roughly half disposal and half EOR) and the attachment you provided which lists greater than 2,000 wells injecting into non-exempt formations (presumably all of which are EOR). Can you clarify?

Thanks,
David

From: Habel, Rob@DOC [mailto:Rob.Habel@conservation.ca.gov]
Sent: Tuesday, October 28, 2014 9:06 AM
To: Albright, David
Cc: Reeves, Bruce@DOC; Bohlen, Steven@DOC
Subject: EPA Requested Data

David:

Here's our best list as requested by EPA of "Wells permitted to inject in hydrocarbon-producing formations with water quality below 10,000 mg/l TDS located in non-exempt aquifers".

1. The following wells were queried from a list of all wells that are associated to a project. All active, idle and newly permitted wells were considered.

2. Only EOR well types (Pressure Maintenance, Cyclic Steam, Steam Flood, Water Flood wells) were considered in the query, the assumption being that EOR wells will be injecting into hydrocarbon-producing formations/zones to enhance the recovery of oil.

3. Wells that had no TDS information were included.

4. All the wells are located outside of the Primacy-exempted boundaries defined by the shaded areas in the data sheets of the publication California Oil and Gas Fields Volumes I (1973) and II (1974).

If you have any questions, please let me know.

Thanks,

Rob